



ARKANSAS
Department of Environmental Quality

May 4, 2009

AECOM

Attn: Leslee J. Alexander, P.G.

Project Manager

10 Patwood Drive, Building VI, Suite 500

Greenville, South Carolina 29615

RE: Wormald Site Investigation Report for Cedar Chemical Company (April 27, 2009)
EPA ID Number ARD990660649; AFIN 54-00068

Dear Ms. Alexander:

The Arkansas Department of Environmental Quality – Hazardous Waste Division (ADEQ) has reviewed the Response to Comments and Revised Wormald Site Investigation Report (SIR) dated April 27, 2009. Based on ADEQ review, the following deficiencies and/or concerns have been noted:

- The 2nd paragraph (page 3) of the SIR mentions the soil samples from the 1 to 4 foot interval and the 8 to 12 foot interval at TSB-1 were prepped and held pending analysis of the 4 to 8 foot sample. The SIR also states the 4 to 8 foot sample intervals were not analyzed since the concentrations of dinoseb at TSB-1 was less than the EPA Region VI MSL. The 1st paragraph (page 3) states all soil samples in the 4 to 8 foot interval exceeded the EPA Region VI MCL-based soil screening level for dinoseb. The 1st and 2nd paragraph contradict one another and should be revised accordingly. The statement that “no further delineation is required” is not necessarily correct and should be revised.
- The actual surveyed location of the sample collected for this investigation is not included in SIR (e.g., grid inclusive of horizontal datum survey coordinates). Please provide an actual grided survey map showing the surveyed location of each sampling location. Note this map must be signed and stamped by a professional land surveyor.
- Please note that soil samples collected at depths greater than 6” should be compared to MCL-based soil screening levels. At the point groundwater is encountered the MCL or tap water screening level.

Please prepare a response to each of the items noted above and submit a revised SIR to ADEQ within ten (10) days of receipt of this letter. If you have any questions or need additional information, please feel free to contact Tammie J. Hynum of my staff at (501) 682-0856 or hynum@adeq.state.ar.us or myself at (501) 682-0831 or at benefield@adeq.state.ar.us.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Ryan Benefield', written in a cursive style.

J. Ryan Benefield, P.E.
Acting Chief
Hazardous Waste Division

cc: Mark Hemingway, P.G., (Amec Consultants, Inc.; 5725 Hwy 290 West, Suite 200B, Austin, TX 78735)
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